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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RENSSELAER POLYTECHNIC
INSTITUTE,

Plaintiff,

V.

SAMSUNG ELECTRONICS AMERICA,
INC., AND SAMSUNG ELECTRONICS
CO., LTD.,

Defendants.

.....

CIVIL ACTION
NO. 2:19-CV-20097 (KM) (ESK)

ANSWER TO COUNTERCLAIMS

MARCH 13, 2020

ANSWER TO COUNTERCLAIMS

Plaintiff/ Counterclaim Defendant Rensselaer Polytechnic Institute (“Rensselaer”) hereby submits its Answer in response to Defendants/ Counterclaim Plaintiffs Samsung Electronics America, Inc. (“Samsung America”) and Samsung Electronics Co., Ltd.’s (“Samsung Electronics”) (collectively “Samsung”) Counterclaim dated February 21, 2020 (ECF #11) as follows:

The Parties

1. Rensselaer is without knowledge or information sufficient to form a belief as to Paragraph 1 and leaves Samsung to its proof.
2. Rensselaer is without knowledge or information sufficient to form a belief as to Paragraph 2 and leaves Samsung to its proof.
3. Admitted.

Jurisdiction and Venue

4. Paragraph 4 of the Counterclaims contains conclusions of law to which no response is required.
5. Paragraph 5 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, Rensselaer does not contest subject matter jurisdiction in this Court for the limited purposes of this action only.
6. Paragraph 6 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, Rensselaer does not contest that this Court has personal jurisdiction over Rensselaer for the limited purposes of this action only. Rensselaer admits it brought the present action through filing its Complaint

(ECF #1). Rensselaer denies the remaining allegations of Paragraph 6.

7. Paragraph 7 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, Rensselaer does not contest venue in this Court for the limited purposes of this action only. Rensselaer admits that it filed the Complaint (ECF #1). Rensselaer denies the remaining allegations of Paragraph 7.

The Presence of a Case or Controversy

8. Admitted.

9. Admitted.

10. Denied.

11. Paragraph 11 of the Counterclaims contains conclusions of law to which no response is required.

12. Paragraph 12 of the Counterclaims contains conclusions of law to which no response is required.

COUNT I
Declaratory Judgment of Noninfringement of the '339 Patent

13. Rensselaer incorporates by reference its responses to Paragraphs 1 through 12 of the Counterclaims.

14. Denied.

15. Paragraph 15 of the Counterclaims contains conclusions of law to which no response is required.

16. Denied.

17. Paragraph 17 of the Counterclaims contains conclusions of law to which no response is required.

18. Paragraph 18 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, denied.

COUNT II
Declaratory Judgment of Invalidity of the '339 Patent

19. Rensselaer incorporates by reference its responses to Paragraphs 1 through 18 of the Counterclaims.

20. Denied.

21. Paragraph 21 of the Counterclaims contains conclusions of law to which no response is required.

22. Denied.

23. Paragraph 23 of the Counterclaims contains conclusions of law to which no response is required.

24. Paragraph 24 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, denied.

COUNT III
Declaratory Judgment of Noninfringement of the '119 Patent

25. Rensselaer incorporates by reference its responses to Paragraphs 1 through 24 of the Counterclaims.

26. Denied.

27. Paragraph 27 of the Counterclaims contains conclusions of law to which no response is required.

28. Denied.

29. Paragraph 29 of the Counterclaims contains conclusions of law to which no response is required.

30. Paragraph 30 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, denied.

COUNT IV
Declaratory Judgment of Invalidity of the '119 Patent

31. Rensselaer incorporates by reference its responses to Paragraphs 1 through 30 of the Counterclaims.

32. Denied.

33. Paragraph 33 of the Counterclaims contains conclusions of law to which no response is required.

34. Denied.

35. Paragraph 35 of the Counterclaims contains conclusions of law to which no response is required.

36. Paragraph 36 of the Counterclaims contains conclusions of law to which no response is required. To the extent a response is required, denied.

PRAYER FOR RELIEF

Rensselaer denies that Samsung is entitled to the relief requested in the Counterclaims. Rensselaer specifically denies that Samsung is entitled to the general or specific relief requests against Rensselaer, or to any relief whatsoever, and requests judgment in its favor as set forth in the Complaint.

/s/ Eric I. Abraham

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Eric I. Abraham
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